<u>MEMORANDUM</u>

SEMS DocID

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To:

The File

From:

Stephen J. Roberson, Environmental Analyst, DEP/NERO/BWSC/SMP

Date:

April 11, 1997

Subject:

MIDDLETON - Former Adhesives Manufacturer, 40 School Street

Release Tracking No. 3-0168

April 11, 1997 Site Visit, Followup Telephone Contact

On April 11, 1997, the writer visited the above-referenced site to observe tank removal activities being conducted by personnel from Draghi Environmental Company of Derry, New Hampshire. The planned activities included the removal of one abandoned 5,000 gallon toluene tank and one abandoned 2,000 gallon fuel oil tank. While these tanks were believed to be in good condition, both contained residual product, and were thus determined to represent a threat of release.

The writer arrived on-site at approximately 12:30 p.m. No personnel from Draghi Environmental were present at the site, nor were any other persons on-site. The writer observed an area of approximately 25 by 30 feet immediately to the southwest of the on-site building (to the left of the building when seen from the street), where soils had apparently been excavated and then regraded. Since this was the area where the two tanks had been located, it was apparent that tank removal activities had been completed prior to the writer's arrival on-site.

The writer contacted Victor Draghi of Draghi Environmental by telephone at approximately 4:00 that afternoon. Mr. Draghi confirmed that the two tanks had been removed that morning with oversight by the Middleton Fire Department, and that the tank removal personnel had left the site just prior to the writer's arrival. Mr. Draghi stated that both tanks had been installed in 1992, and that both appeared to be in excellent condition, with no significant deterioration or observable leaks. Mr. Draghi reported that the toluene tank contained mostly water (a total of 953 gallons of water were pumped from the tank), with about 1/2 inch of product floating on the surface; Mr. Draghi speculated that the water had entered the tank through a loose fitting on the fill pipe. Mr. Draghi stated that the fuel oil tank was dry. Soil samples were taken from around the loose fill pipe joint for the toluene tank, and from the sidewalls of the fuel tank excavation (the base of both excavations were filled with water). Mr. Draghi will obtain analytical results from both samples, and forward these results to the DEP.

Mr. Draghi stated that his company is preparing an estimate for the property owner for the characterization of drums in trailers and in the warehouse at the facility. Mr. Draghi indicated that he believes the drums in the trailers predominantly contain manufactured adhesive products, which were placed in the trailers in anticipation of shipping shortly before the company went out of business. He believes that about 85% of the materials in the containers are non-hazardous. His proposal involves the initial characterization and segregation of the drums, after which he will prepare a second estimate for their removal and disposal. Mr. Draghi agreed to notify the Department of his intent to do this work upon receiving authorization from the property owner.